

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

MILDRED HENDRIX,

Plaintiff,

V.

TARGET ENTERPRISE, INC. (MN) ABC  
CORPS #1-3, and JOHN DOES #1-3,

Defendants.

CIVIL ACTION NO.

Removed From Gwinnett  
State Court Civil Action File  
No.: 23EV004629

**DEFENDANT TARGET CORPORATION'S  
CERTIFICATE OF INTERESTED PERSONS AND  
CORPORATE-PARTY DISCLOSURE STATEMENT**

Pursuant to Federal Rule of Civil Procedure 7.1 and Local Rule 3.3, Defendant Target Corporation (“Target”) files its Certificate of Interested Persons and Corporate Disclosure Statement as follows:

(1) The undersigned counsel of record for a party to this action certifies that the following is a full and complete list of all parties in this action, including any parent corporation and any publicly held corporation, that owns 10% or more of the stock of a party:

**a. Defendant Target Corporation.**

(2) The undersigned further certifies that the following is a full and complete list of all other persons, associations, firms, partnerships, or corporations having either a financial interest in or other interest which could be substantially affected by the outcome of this particular case:

**a. Michael Johnson;**

**b. Morgan & Morgan**

(3) The undersigned further certifies that the following is a full and complete list of all persons serving as attorneys for the parties in this proceeding:

**a. Michael Johnson (Morgan & Morgan) for Plaintiff Mildred Hendrix; and**

**b. Brian K. Mathis (Huff, Powell & Bailey, LLC) for Defendant Target Corporation.**

(4) The undersigned further certifies that the following is a list of citizenship of all parties:

**a. Defendant Target Corporation is a domestic for Profit (Business) Corporation incorporated and domiciled in the State of Minnesota, with its principal place of business in Minnesota; for purposes of**

**determining diversity jurisdiction, Target is therefore a citizen of Minnesota. 28 U.S.C. § 1332(c)(2);**

**b. Plaintiff Mildred Hendrix is a citizen of the State of Georgia.**

This 7<sup>th</sup> day of September, 2023.

Respectfully submitted,

HUFF, POWELL & BAILEY, LLC

/s/ Brian K. Mathis

BRIAN K. MATHIS

Georgia Bar No.: 477026

*Counsel for Defendant Target  
Enterprise, Inc. (Improperly Named  
Defendant)*

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Atlanta, Georgia 30309  
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**CERTIFICATE OF COMPLIANCE**

Pursuant to Local Rules 5.1(B) and 7.1(D), I hereby certify that the foregoing filing complies with the applicable font and size requirements and is formatted in Times New Roman, 14-point font.

HUFF, POWELL & BAILEY, LLC

/s/ Brian K. Mathis

BRIAN K. MATHIS

Georgia Bar No.: 477026

*Counsel for Defendant Target  
Enterprise, Inc. (Improperly Named  
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**CERTIFICATE OF SERVICE**

This is to certify that I have this day served a true and correct copy the DEFENDANT TARGET CORPORATION'S CERTIFICATE OF INTERESTED PERSONS AND CORPORATE-PARTY DISCLOSURE STATEMENT upon all parties or their counsel of record via CM/ECF's Electronic Case Filing System and by Statutory Electronic Service, addressed as follows to assure delivery to:

Michael A. Johnson  
MORGAN & MORGAN  
PO BOX 57007  
Atlanta, Georgia 30343-1007  
[majohnson@forthepeople.com](mailto:majohnson@forthepeople.com)

*Counsel for Plaintiff*

This 7<sup>th</sup> day of September, 2023.

HUFF, POWELL & BAILEY, LLC

/s/ Brian K. Mathis  
BRIAN K. MATHIS  
Georgia Bar No.: 477026

*Counsel for Defendant Target  
Enterprise, Inc. (Improperly Named  
Defendant)*

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